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February 23, 2022

VIA ECF

Honorable Cathy L. Waldor, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King Jr. Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

**Re: Dellamorte, LLC et al. v. The Michaels Companies, Inc.,
Civil Action No. 21-2029 (CCC) (CLW)**

Dear Judge Waldor:

This firm represents Defendant The Michaels Companies, Inc. (“Defendant”) in the above-referenced action. We write to respectfully request a second 14-day extension of Defendant’s deadline to file an answer to Plaintiff’s complaint, which would extend Defendant’s deadline from February 24, 2022, to March 10, 2022. This is Defendant’s second request for an extension of this deadline. The parties have been discussing potential settlement, and the requested extension will allow the parties to avoid potentially unnecessary expense while they continue to do so. Plaintiff’s counsel has agreed to the requested extension.

If the foregoing meets with Your Honor’s approval, we respectfully request that Your Honor “So Order” this letter. We thank the Court for its consideration of this request and remain available at the Court’s convenience to address any questions or concerns.

Respectfully submitted,

s/ J. Brugh Lower
J. Brugh Lower

cc: All counsel of record (via ECF)